

STATE OF COLORADO

Bill Owens, Governor
Douglas H. Benevento, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

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Colorado Department
of Public Health
and Environment

March 15, 2005

Mr. Joseph Legare
Director, Project Management Division
U.S. Department of Energy
Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, Colorado 80403-8200

RE: Approval, Draft Closeout Report, IHSS Group 700-2, (UBC 707 – Plutonium Fabrication and Assembly, and UBC 731 – Building 707 Process Waste), February 2005

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division) hereby grants approval for the revised report and, as a consequence, No Further Accelerated Action (NFAA) for IHSS Group 700-2. A comment resolution meeting and subsequent revisions via e-mail were successful in resolving the Division's comments. Attached are the initial written comments from the Division and EPA.

The principle issues subsequently addressed within the report were:

- Alleviating concerns over data adequacy by noting the availability of data from an adjacent boring along the Old Process Waste Line (OPWL).
- Acknowledging cross-contamination of underlying soils during slab removal activities and further remediation and verification sampling.
- Properly applying the Elevated Measurement Comparison and Subsurface Soil Risk Screen, respectively, to surface and subsurface soils.
- Specifically acknowledging arsenic and chromium and demonstrating NFAA relative to potential impact to surface water.

We look forward to confirming that resolution of the principle issues, and minor additional changes, are reflected in the final document. If you have any questions regarding this correspondence, please contact me at (303) 692-3367 or Harlen Ainscough at 303-692-3337.

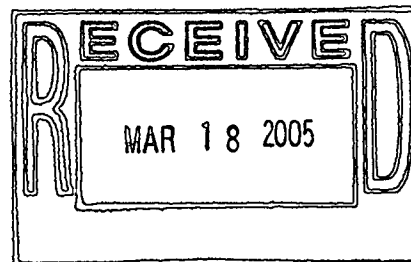
Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

Attachments (2)

cc: Mark Aguilar, EPA
Larry Kimmel, EPA
Dave Shelton, KH
Steve Nesta, K-H

Mark Sattelberg, U.S.F&W
Norma Castaneda, DOE
Karen Wiemelt, KH
Administrative Records Building T130G



ADMIN RECORD

Colorado Department of Public Health and Environment

Hazardous Materials & Waste Management Division

Comments

Draft Closeout Report

IHSS Group 700-2

(UBC 707 – Plutonium Fabrication and Assembly
and UBC 731 – Building 707 Process Waste)

February 2005

Specific Comments:

1. **Executive Summary:** In second paragraph, the OPWL work should be complete, or shortly, and should be referenced as such. Otherwise, there may be issues to consider before approval of this report.
2. **Section 2.2:** Reference to the IASAP is correct for the SAP addendum, but Appendix C should be referenced as being in the IABZSAP. Especially, if Appendix C was modified within the IABZSAP.
3. On Page 15, first and second paragraph, the 95 percent UCL protocol should be referenced to the IABZSAP.
4. In the fourth paragraph, or in a new paragraph, please discuss that the "B" interval of sampling location CF44-017 was not collected due to a pipe obstruction. The discussion should note that the interval 0.5-1.2 was collected at adjacent location CF44-025, that it was located along the OPWL and that all COCs were below background and/or reporting limits. Please ensure that the vertical (Z) relationship is valid between the locations.
5. Also, discuss the co-location of CG43-015 and CG43-024, relative to the missing "B" interval of CG43-024.
6. **Section 4.0:** The removal of the slab should be complete by this date, please report as such. Additionally, we understand that the slab was flipped over at some locations resulting in radionuclide contamination of the surface soils. Please discuss all aspects of the resulting remediation and, as appropriate, confirmation sampling effort. If no remediation/confirmation sampling, please explain in all relevant sections.)
7. **Section 4.1.2:** See Comment No. 6.
8. **Section 4.1.3:** See Comment No. 1.
9. **Section 5.0:** See Comment No. 6.
10. **Section 7.0, Screen 1:** Only three subsurface arsenic values exceeded WRW and none were remediated. The "fourth" one described as having been remediated, was the surface (+3x) hotspot. Additionally, the benzo(a)pyrene WRW exceedance was a surface occurrence. Please remove the surface locations from the discussion or acknowledge as surface samples.
11. **Screen 3:** Although the sampling of the OPWL was moved to IHSS Group 000-2, it may be appropriate to acknowledge RFCA Attachment 14 as being considered in the 000-2 Closeout Report. Alternatively, note it in this document.
12. **Screen 4:** Please discuss arsenic, i.e. low residual levels.
13. **Section 8.1:** CG42-008 should be corrected to read, "0.0-0.5 ft". See Table 3, a subsurface sample would not invoke the hotspot analysis but rather the SSRS.

14. **CG43-015:** Delete reference to "arsenic 24.3 mg/kg, 0.5 to 2.5 feet". The subsurface sample does not invoke the hotspot analysis.
15. **Section 14.2.3:** Regarding the rejected metals record included in Table 22, please determine the metal and indicate, if so, that the rejection does not affect project decisions.
16. **Section 15.0:** Relative to the second bullet, delete or modify the reference to benzo(a)pyrene, it was from a surface sample and not subject to the SSRS.
17. **Appendix B:** Please include the CRs dated May 10, 2004 and January 19, 2005.

Serreze, Susan

From: Sam Garcia [swgarcia@earthlink.net]
Sent: Thursday, February 17, 2005 8:02 AM
To: Serreze, Susan
Cc: tbechtel; Castaneda, Norma; Larry Kimmel; Wiemelt, Karen; Ainscough, Harlen; David Kruchek
Subject: IHSS Group 700-2 Closeout Report

Hi Susan,

EPA has two comments regarding the subject document.

Page ES-2, first bullet. The concentration for benzo[a]pyrene references 2,700 ug/kg. Based on data presented in the tables and the first paragraph on this page, the concentration should reflect 3,700 ug/kg.

Page 64 is missing on the hardcopy document.

thanks,

Sam

Sam Garcia
swgarcia@earthlink.net
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